

UNITED STATES DISTRICT COURT DISTRICT OF NEW MEXICO

**JORGE GOLDEN, individually and on
behalf of all others similarly situated, and
ANTHONY YBARRA,
Plaintiffs,**

v.

Civ. No. 22-579 GJF/GBW

**QUALITY LIFE SERVICES, LLC,
SALLY CHAVEZ, and APRIL LICON,
Defendants.**

UNOPPOSED MOTION TO WITHDRAW AND FOR SUBSTITUTION OF COUNSEL

COMES NOW Rodey, Dickason, Sloan, Akin & Robb, P.A. (“Movant”), pursuant to D.N.M.LR-Civ.83.8(a), and hereby moves this court for its order allowing Movant to withdraw as counsel of record for Defendants Quality Life Services, LLC, Sally Chavez and April Licon. The Motion is unopposed and the Defendants have consented.

As grounds for this motion, Movant states that the law firm of Moody & Stanford, P.C. (Repps D. Stanford/Christopher M. Moody) will be substituting for the Defendant in this matter. Pursuant to D.N.M.LR-Civ.83.4(a)(b), a copy of the Entry of Appearance by Substitute Counsel is attached hereto as Exhibit A. The address of record for Moody & Stanford, P.C. is contained on Exhibit A, as well as below.

WHEREFORE Movant respectfully requests that Court grant the Unopposed Motion to Withdraw and For Substitution of Counsel.

Respectfully Submitted by,

MOODY & STANFORD, PC

By: Repps D. Stanford 2023.12.27

Repps Stanford
Christopher M. Moody
8500 Menaul NE, Ste. A-210
Albuquerque, NM 87112
Mailing Address: P.O. Box 91853
Albuquerque, NM 87199
(505) 944-0033
stanford@nmlaborlaw.com
moody@nmlaborlaw.com
Substitute Attorney for Defendants

RODEY, DICKASON, SLOAN, AKIN &
ROBB, P.A

By: Approved via email Krystle Thomas 2023.12.19

201 Third Street NW, Suite 2200
Albuquerque, New Mexico 87102
(505) 768-7356
KThomas@rodey.com
Withdrawing Attorney for Defendants

CERTIFICATE OF SERVICE

I certify that on December 27, 2023 the foregoing has been electronically served on counsel of record for Plaintiffs, Douglas B. Wellmaker (doug@welmakerlaw.com) and Christopher Benoit (chris@coylefirm.com) via the CM-ECF filing system.

By: /s/ Repps D. Stanford
Repps D. Stanford